

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	CHAPTER 11
	§	
FIELDWOOD ENERGY, LLC, <i>et al.</i> <sup>1</sup>	§	CASE NO. 20-33948 (MI)
	§	
DEBTORS.	§	JOINTLY ADMINISTERED
	§	

**JOINDER AND RESERVATION OF RIGHTS OF CERTAIN TRADE CREDITORS TO  
BEDROCK PETROLEUM CONSULTANTS, LLC’S LIMITED OBJECTION TO DIP  
FINANCING AND CASH COLLATERAL MOTION**  
**[Relates to Dkt. Nos. 22 and 192]**

COMES NOW Diversified Well Logging, LLC and TETRA Technologies, Inc. (collectively, the “Certain Trade Creditors”) by and through its undersigned counsel, and files this joinder and reservation of rights to the limited objection filed by Bedrock Petroleum Consultants, LLC (“Bedrock”) to the *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing* [Docket No. 22] (the “DIP Motion”). In support of this reservation of rights, limited objection and joinder, the Certain Trade Creditors offer the following:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

### **FACTUAL BACKGROUND**

1. The Debtors are oil and gas exploration and production companies in the Gulf of Mexico.

2. The Certain Trade Creditors are oil and gas services companies, which performed labor and/or furnished or hauled material at the request of the Debtors.

3. As of the date of this Limited Objection, the Debtors owe Diversified Well Logging, LLC at least \$515,180.10 for contracted services provided prior to the petition date. Copies of invoices itemizing these amounts are available upon request to Diversified Well Logging, LLC's counsel. Diversified Well Logging, LLC reserves the right to recover interest, attorneys' fees, and other allowed costs.

4. As of the date of this Limited Objection, the Debtors owe TETRA Technologies, Inc. at least \$5,582,780.00 for contract services provided prior to the petition date. Copies of invoices itemizing these amounts are available upon request to TETRA Technologies, Inc.'s counsel. TETRA Technologies, Inc. reserves the right to recover interest, attorneys' fees, and other allowed costs.

5. The Certain Trade Creditors have or are entitled to assert and perfect mineral liens against certain of the Debtors' offshore assets pursuant to 11 U.S.C. 546(b), MISS. CODE § 85-7-401, *et seq.*, ALA. CODE §§ 35-11-213 *et seq.*, TEX. PROP. CODE §§ 56.001 to 56.045, LA. R.S. §§ 9:4861 to 9:4889, and other applicable law. Such secured claims may be asserted against the Debtors' and/or third parties' interests in wells or other mineral assets and relate back to the time goods or services are provided. Accordingly, Certain Trade Creditors are preserving their mineral lien rights pursuant to section 546(b) of the Bankruptcy Code.

**JOINDER TO LIMITED OBJECTION**

6. Certain Trade Creditors join the limited objection filed by Bedrock Petroleum Consultants, LLC [Dkt. No. 192], filed in response to the DIP Motion, in its entirety, as if fully set out herein, insofar as the same relates to the interests held by the Certain Trade Creditors. The Certain Trade Creditors ask that they also be listed in the proposed language.

7. Based on the foregoing, Certain Trade Creditors reserve its rights to object to the entry of the Final DIP Order, absent the proposed order including provisions requested by Bedrock relating to the preservation of rights and remedies regarding statutory oil and gas mechanic's and materialman's liens.

**RESERVATION OF RIGHTS**

8. The Certain Trade Creditors expressly reserve its rights to raise these objections and any other such objections, or to join in any other objections relating to the DIP Motion, at any time prior to the hearing considering the DIP Motion on a final basis, regardless of whether Bedrock's limited objection is resolved prior to such hearing.

WHEREFORE, PREMISES CONSIDERED, Certain Trade Creditors pray the Court grants it the relief requested herein, and the Court order such other and further relief the Court deems just and proper.

Dated August 20, 2020

Respectfully submitted,

**DORÉ ROTHBERG MCKAY, P.C.**

By: /s/ Zachary S. McKay

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2020, a true and correct copy of the foregoing was served by the Court's Electronic Case Filing System to all parties registered or otherwise entitled to receive electronic notices.

/s/ Zachary S. McKay

Zachary S. McKay